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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ADELE SHIREY; and DESTINY
SHIREY,

Plaintiffs,

v.

COUNTY OF RIVERSIDE; MARTIN
HUIZAR; and DOES 1 through 10,
inclusive,

Defendants.

Case No. 5:25-cv-01541-DMG-E

**STIPULATION TO ALLOW
PLAINTIFFS TO AMEND
COMPLAINT TO NAME
INDIVIDUAL DEFENDANT
DEPUTIES IN PLACE OF DOE
DEFENDANTS 1-3**

*[Proposed Order filed concurrently
herewith]*

TO THIS HONORABLE COURT:

IT IS HEREBY STIPULATED by and between Plaintiffs ADELE SHIREY and DESTINY SHIREY, and Defendants COUNTY OF RIVERSIDE and MARTIN HUIZAR (“the Parties”), by and through their respective attorneys of record, as follows:

1. Plaintiffs filed their Complaint on June 20, 2025. [Dkt. 1.] At the time of the filing of their Complaint, Plaintiffs were genuinely ignorant of the names of the County of Riverside Sheriff’s Department employees who are alleged to have unlawfully entered Plaintiffs’ home and detained Plaintiff DESTINY SHIREY therein during the subject incident, save for Defendant MARTIN HUIZAR.
2. Subsequently, through discovery, Plaintiffs have discovered information that the pertinent County of Riverside Sheriff’s Department employees who entered Plaintiffs’ home and/or participated in the detention of Plaintiff DESTINY SHIREY during the incident giving rise to this lawsuit are believed to include Jared Anderson, Jacob Fontana, and Son Ly.
3. The Parties agree that Plaintiffs may file an amended complaint for the purpose of naming the foregoing individuals as individual defendants, in lieu of the current fictitiously named defendants “Does 1-3,” and identifying the alleged roles and responsibilities of these individuals as regards the incident giving rise to this lawsuit.
4. A copy of Plaintiffs’ proposed First Amended Complaint is attached hereto as “Exhibit A.”
5. Counsel for Defendants COUNTY OF RIVERSIDE and MARTIN HUIZAR agrees to accept service of the First Amended Complaint on behalf of Defendants COUNTY OF RIVERSIDE and MARTIN HUIZAR.

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1 6. The Parties agree that Plaintiffs shall have 7 days to file their First
2 Amended Complaint after the Court grants them leave, and that all
3 Defendants shall have 21 days after service thereof to file a responsive
4 pleading.

5 7. No currently scheduled hearings or other deadlines will be affected by the
6 granting of this stipulation or by the filing of a First Amended Complaint.
7

8 **IT IS SO STIPULATED.**
9

10 DATED: October 3, 2025

LAW OFFICES OF DALE K. GALIPO

12 By: /s/ Benjamin S. Levine
13 Dale K. Galipo
14 Benjamin S. Levine¹
15 *Attorneys for Plaintiffs*

16 DATED: October 3, 2025

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

18 By: /s/ Kayleigh Andersen
19 Eugene P. Ramirez
20 Kayleigh Andersen
21 *Attorneys for Defendants County of*
22 *Riverside and Martin Huizar*
23
24
25

26 _____
27 ¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all
28 other signatories listed, and on whose behalf the filing is submitted, concur in the
filing's content and have authorized the filing.